

SSS:DJL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

GLORIA CUERVO ROMAN,

Defendant.

AFFIDAVIT IN SUPPORT OF
REMOVAL TO THE
CENTRAL DISTRICT OF CALIFORNIA
(Fed. R. Crim. P. 5)

No. 19-MJ-51

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT MARTINEZ, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about December 10, 1998, a warrant for the arrest of the defendant GLORIA CUERVO ROMAN was issued by the United States District Court for the Central District of California, in connection with a superseding indictment charging the defendant with: (1) aiding and abetting the distribution of controlled substances in violation of Title 21, United States Code, Section 846; (2) conspiracy to launder monetary instruments, in violation of Title 18, United States Code, Section 1956(h); (3) laundering of monetary instruments, in violation of Title 18 United States Code, Section 1956(a)(1); and (4) with being a principal administrator of a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848(b).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about December 10, 1998, a warrant for the arrest of the defendant GLORIA CUERVO ROMAN was issued by the United States District Court for the Central District of California, in connection with a superseding indictment charging the defendant with: aiding and abetting the distribution of controlled substances, in violation of Title 21, United States Code, Section 846; conspiracy to launder monetary instruments, in violation of Title 18, United States Code, Section 1956(h); laundering of monetary instruments, in violation of Title 18 United States Code, Section 1956(a)(1); and being a principal administrator of a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848(b). A true and correct copy of the arrest warrant is attached hereto as Exhibit A. A true and correct copy of the superseding indictment is attached as Exhibit B.

2. On or about January 20, 2019, a Customs and Border Protection (“CBP”) database notified law enforcement authorities that a passenger, GLORIA CUERVO ROMAN, was flying into John F. Kennedy International Airport (“JFK Airport”) from Bogota, Colombia, aboard Avianca Airlines flight #244. The CBP database indicated that there was an outstanding warrant for the arrest of the defendant GLORIA CUERVO ROMAN from the Central District of California.

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause for removal, I have not described all of the relevant facts and circumstances of which I am aware.

3. CBP officers conducted records checks, reviewed photographs and confirmed that the passenger GLORIA CUERVO ROMAN was indeed the individual named in the Central District of California arrest warrant. HSI agents also reviewed law enforcement databases, records, photographs and spoke with law enforcement authorities in the Central District of California to confirm that the passenger, GLORIA CUERVO ROMAN, was indeed the defendant named in the arrest warrant.

4. HSI agents also compared the appearance of the defendant GLORIA CUERVO ROMAN to known photographs of the individual wanted in the Central District of California and found her to appear to be the same individual. Further, her name appeared on her travel documents, confirming that the defendant is the same individual as the passenger.

WHEREFORE, your deponent respectfully requests that the defendant GLORIA CUERVO ROMAN be removed to the Central District of California so that she may be dealt with according to law.



Robert Martinez
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
22nd day of January, 2019

THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

EXHIBIT A

United States District Court
Central District of California

United States of America

Plaintiff

Y

WARRANT FOR ARREST

Case Number: CR 98-503 (A)-MMM

GLORIA CUERVO ROMAN

Defendant

**TO: The United States Marshal and
Any Authorized United States Officer**

YOU ARE HEREBY COMMANDED to arrest GLORIA CUERVO ROMAN (Name)

and bring him or her forthwith to the nearest magistrate judge to answer a(n):

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition
charging him or her with (brief description of offense):

CONSPIRACY TO AID AND ABET THE DISTRIBUTION OF CONTROLLED SUBSTANCES;
CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS;
LAUNDERING OF MONETARY INSTRUMENTS;
PRINCIPAL ADMINISTRATOR OF A CONTINUING CRIMINAL ENTERPRISE;
FORFEITURE;
AIDING AND ABETTING/CAUSING AN ACT TO BE DONE 25

in violation of Title 21, 18

United States Code, Section(s) 846, 1956(h)(a), 848(b), 851

846

SHERRI B. CARTER

CLERK OF COURT

Name of Issuing Office:

CLERK
True of Issuing Office

Software - DEPARTMENT OF

By MAGISTRATE: JUDGE HILLMAN
Name of Judicial Officer

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

United States District Court
Central District of California

ORIGINAL

COPIED

United States of America

Plaintiff

v.

WARRANT FOR ARREST

Case Number: CR 98-503

Gloria Cuervo Roman

Defendant

TO: The United States Marshal and
Any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest Gloria Cuervo Roman
(Name)

and bring him or her forthwith to the nearest magistrate judge to answer a(n):

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition
charging him or her with (brief description of offense):

Conspiracy to aid and abet the distribution of controlled substances; Conspiracy to Launder Monetary Instruments; Laundering of Monetary Instruments; Continuing Criminal Enterprise; Forfeiture; Forfeiture; Aiding and Abetting/Causing An Act to be done;

in violation of Title 21 & 18 United States Code, Section(s) 846,853 & 1956(h)(a),982,2

SHERRI R. CARTER
Name of Issuing Officer

Sherri R. Carter
Signature of Issuing Officer

CLERK OF COURT

Title of Issuing Officer

5/14/98 Los Angeles,

Date and Location

CA

By Magistrate/judge Rick
Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at _____

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

CR-1 (10/97)

WARRANT FOR ARREST

EXHIBIT B